

21       an audio dictionary for driving said voice generator to  
22       provide said audio signals; and  
  
23       D3  
24       a control computer coupled to said memory unit and said  
25       telephonic interface apparatus for actuating said telephonic  
26       interface apparatus to selectively communicate from said  
27       plurality of remote location to one of said plurality of  
28       television display structures in accordance with said time  
29       sequence data and to control the display of said television  
          display structures.

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R E M A R K S

This amendment is in response to the office action dated April 30, 1997. Claims 26-51 are pending, 26-33 of which are allowed. Applicant appreciates allowance of claims 26-33. Claim 50 is objected to and claims 34-49 and 51 are rejected. By this amendment, Applicant has amended claims 34, 46, and 50 and is presenting arguments to distinguish the prior art asserted by the Examiner.

Reconsideration and allowance of 34-51 is respectfully requested.

I. Rejection of Claims 34-39 and 46-49 Under 35 U.S.C.

Section 102(b)

In paragraph 2 of the office action, claims 34-39 and 46-49 are rejected under 35 U.S.C. Section 102(b) as anticipated by the publication entitled "Vision by telephone." The Examiner alleges

that the system "discloses a system for monitoring a plurality of scrutiny locations from a central station using dial-up telephone facilities in which images from each scrutiny location are sequentially received and displayed along with graphic data identifying the picture displayed (page 2). When an alarm sensor at a scrutiny location is triggered, the associated camera takes four snap-shots which are stored and transmitted to the called central station for priority display such that the usual surveillance sequence is interrupted (page 2, column 1, paragraph 4). Two-way audio communication can take place via telephones at each remote site and the central station (see figures on pages 2-3)."

Applicant notes that the system described by the publication relied upon by the Examiner is distinct from Applicant's system for several reasons. At the outset, Applicant notes that the publication characterizes its system as a "communication concept for the transmission of pictorial data, cheaply and efficiently," whereby it transmits "snap-shot" pictures "in a relatively slow serial form." The publication describes that the "video camera takes a snapshot picture which is fed instantly into an adjacent picture (or frame) store" and that this "store is then scanned rapidly line by line and the resultant serial information transmitted over the telephone to be reconstituted as a complete picture at the monitoring end in less than ten seconds." Rather than transmit discrete snap-shots in sequence of scenes, Applicant's system transmits dynamic image television signals

representative of scenes in sequence and in real-time. Claims 34 and 46 strongly emphasize this distinction. Moreover, although the Examiner points to the publication's "alarm mode" as support for the interrupt feature recited in the claim, the very nature of Applicant's interrupt feature is quite different given the real-time operation of his system.

Claims 35-39 depend on claim 34 and claims 47-49 depend on claims 46. Both sets of dependent claims are distinct at least for the reasons urged with respect to their parent claims. Accordingly, Applicant requests the Examiner to withdraw her rejection of claims 34-39 and 46-49.

## II. Rejection of Claims 40-45, 48, and 51 Under 35 U.S.C.

### Section 103(a)

In paragraph 4 of the office action, claims 40-45, 48, and 51 are rejected under 35 U.S.C. Section 103(a) as obvious over the publication entitled "Vision by telephone" in view of Thompson.

Claim 40 is independent, with claims 41-45 dependent on it. Claims 48 and 51 depend on claim 46, with respect to which Applicant urges the distinction noted in the prior section. Similar to claim 46, claim 40 also emphasizes transmission of dynamic image television signals as opposed to "snap-shots," which distinguish it from the asserted publication. Thus, claims 40-45, 48, and 51 differ from the publication in that they do not provide for storing display data on scrutiny locations, in

addition to, the distinction urged above with respect to the dynamic nature of Applicant's system. Accordingly, even if the references were combined in the manner suggested by the Examiner, Applicant argues that his claims 45, 48, and 51 would not be obvious.

Applicant requests the Examiner to allow these claims.

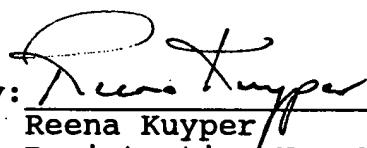
### III. Objection to Claim 50

In paragraph 6 of the office action, claim 50 is objected to as dependent upon a rejected base claim. Applicant has amended claim 50 to include all the limitations of claim 46, from which it depends. Allowance of claim 50 is respectfully requested.

### IV. Conclusion

Based on the above amendments and arguments, Applicant respectfully requests allowance of claims 34-51.

Respectfully submitted,

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